

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

LUIS HUERTAS

**03** CR **10347-MEW**

Criminal No.

**VIOLATIONS:**

21 U.S.C. §846--

Conspiracy to Distribute  
Heroin

21 U.S.C. §841(a)(1)--  
Distribution of Heroin

18 U.S.C. §2--  
Aiding and Abetting

21 U.S.C. §853--  
Criminal Forfeiture

**INDICTMENT**

**COUNT ONE:** (21 U.S.C. §846 -- Conspiracy To Distribute  
Heroin)

The Grand Jury charges that:

From a time unknown to the Grand Jury, but at least by  
August 7, 2003, and continuing thereafter until on or about  
August 7, 2003, at Lawrence, in the District of Massachusetts,

**LUIS HUERTAS**

the defendant herein, did knowingly and intentionally conspire  
and agree together, and with persons known and unknown to the  
Grand Jury, to possess with intent to distribute and to  
distribute quantities of heroin, a Schedule I controlled  
substance, in violation of Title 21, United States Code, Section

841(a)(1).

All in violation of Title 21, United States Code, Section  
846.

**COUNT TWO:** (21 U.S.C. §841(a)(1)--Distribution of Heroin; 18 U.S.C. §2--Aiding and Abetting)

The Grand Jury further charges that:

On or about August 7, 2003, at Lawrence, in the District of Massachusetts,

**LUIS HUERTAS**

the defendant herein, did knowingly and intentionally possess with intent to distribute and distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION**

**(21 U.S.C. § 853)**

The Grand Jury further charges that:

1. As a result of the offenses alleged in Counts 1 and 2 of this Indictment,

**LUIS HUERTAS**

defendant herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendants --


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;


it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property

described in paragraph 1.

All in violation of Title 21, United States Code, Section  
853.

A TRUE BILL,

  
FOREPERSON OF THE GRAND JURY

  
PETER K. LEVITT  
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS

November 13, 2003 @ 2:35 PM

Returned into the District Court by the Grand Jurors and  
filed.

  
Deputy Clerk